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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

UNITED STATES OF AMERICA,

No. 3:20-cr-00464-SI

Plaintiff,

v.

DECLARATION OF COUNSEL IN
SUPPORT OF UNOPPOSED MOTION
TO CONTINUE TRIAL DATE

PHILLIP JOHN WENZEL,

Defendant.

I, Conor Huseby, declare:

1. I represent Phillip Wenzel who is charged with one count of Civil Disorder. Trial is set for December 1, 2020. Mr. Wenzel is out of custody and in full compliance with the terms of his release.
2. This is the first request to continue a trial date from the parties in this case.

3. Additional time is needed to receive additional discovery from the government, conduct investigation, research legal issues and file potential motions, and consult with Mr. Wenzel regarding his rights and options.

4. The failure to grant a continuance in this case would deny counsel for the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(7)(A).

5. I have previously discussed this requested continuance with counsel for the government, Pamela Paaso, and she has no objection to this requested continuance.

6. I have spoken with Mr. Wenzel, explained the reasons for requesting a continuance, and the rights that he has under the Speedy Trial Act. Mr. Wenzel agrees with defense counsel's request for a continuance and waives his rights under the Speedy Trial Act.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief and that this declaration was executed on November 17, 2020, in Portland, Oregon.

/s/ Conor Huseby
Conor Huseby
Assistant Federal Public Defender